

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

STAVROS PAPANTONIADIS

Defendant

CRIMINAL No. 24-10084-AK

JOINT MEMORANDUM PURSUANT TO LOCAL RULE 116.5(a)

The United States of America, by Joshua S. Levy, Acting United States Attorney, and Brian A. Fogerty and Timothy E. Moran, Assistant United States Attorneys for the District of Massachusetts, and defendant Stavros Papantoniadis, through Carmine Lepore, file this memorandum pursuant to Local Rule 116.5(a). The parties request that the Court vacate the currently set initial status conference and reset the case for an interim status conference in 4 weeks.

1. Automatic Discovery / Pending Discovery Requests

On June 7, 2024, the defendant was convicted at trial in a separate criminal case involving Forced Labor and Attempted Forced Labor offenses, *United States v. Papantoniadis*, 23-10089-FDS. In that case, the government produced voluminous discovery, some of which relates to this case. Specifically, the government previously produced automatic discovery, including Bates Nos. 1–242060. The discovery in case number 23-10089-FDS included items produced or made available for inspection data from a cell phone seized during Papantoniadis’ arrest; applications, affidavits, and search warrants for an iCloud account and other locations; material related to border searches conducted by U.S. Customs and Border Protection; law

enforcement reports; jail calls; business records; Small Business Administration records; accounting firm records; and other items.

On May 17, 2024, the government provided its automatic discovery letter, identifying specific previously produced items that are relevant and discoverable in this case.

2. Timing of Additional Discovery Productions

None at this time.

3. Timing of Additional Discovery Requests

None at this time.

4. Protective Orders

The defendant assented without prejudice to a proposed protective order governing the previously produced discovery items, which the Court entered on July 14, 2023. See Case No. 23-10089-FDS, ECF No. 42.

5. Pretrial Motions under Fed. R. Crim. P. 12(b)

The defendant is continuing to review the discovery produced to determine whether there are any viable pretrial motions.

6. Timing of Expert Witness Disclosures

The Court will set the timing of expert witness disclosures.

7. Speedy Trial Act

The parties agree to exclude the time between the initial status conference and the interim status conference. The parties agree that this period of time requested above constitutes reasonable time necessary for effective preparation, taking into account the exercise of due diligence, and that the ends of justice served by granting this motion outweigh the best interest of the public and the defendant in a speedy trial pursuant to the Speedy Trial Act, 18 U.S.C. §§

3161(h)(7)(A) and 3161(h)(7)(B)(iv). *See also* Sections 5(b)(7)(A), 5(b)(7)(B) and 5(b)(7)(C)(iv) of the Plan for Prompt Disposition of Criminal Cases for the United States District Court for the District of Massachusetts (effective December 2008).

Respectfully submitted,

JOSHUA S. LEVY
Acting United States Attorney

By: /s/ Brian A. Fogerty
BRIAN A. FOGERTY
TIMOTHY E. MORAN
Assistant United States Attorneys

STAVROS PAPANTONIADIS
Defendant

By: /s/ Carmine Lepore
CARMINE LEPORE
Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Brian A. Fogerty

BRIAN A. FOGERTY

Assistant United States Attorney

Date: June 18, 2024